

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:

Ryan Firestone
Sara Firestone,
Debtors.

Case No. 24-53688

Chapter 13

Judge John E. Hoffman, Jr.

APPLICATION FOR COMPENSATION

Laura M. Nesbitt, counsel for Debtors, hereby applies to this Court for an allowance of attorney's fees in her capacity as attorney for the above referenced Debtors. This request for fees is made pursuant to LBR 2016-1(b) and is for services provided in a dismissed case prior to confirmation. The proposed percentage payment to unsecured creditors was 80% and the proposed plan length was 60 months.

Despite attorney's efforts to present this case for confirmation, Debtors were unable to make timely plan payments and their case was dismissed. The court's order of dismissal was entered on February 14, 2025 (Doc. 34). This application is made within 14 days of said dismissal.

Attorney spent approximately 10 hours, 24 minutes on the above referenced matters resulting in \$4,420.00 legal fees for services performed, Attorney's staff spent approximately 5 hours, 54 minutes, on the above referenced matter resulting in \$688.50 of legal fees for services performed. Further, Attorney incurred out of pocket expenses in relation to the work performed in the amount of \$94.06. Therefore, Attorney requests she be allowed a total compensation for legal fees and expenses in the amount of \$5,202.56. Attorney will credit the invoice for \$915.00 dollars, reducing the invoice owed to \$4,290.56.

WHEREFORE, Attorney requests she be allowed a total compensation for legal fees and expenses in the amount of \$5,202.56 and that the balance owed of \$4,290.56 to be paid to attorney out of the balance on hand with the Chapter 13 trustee, or in any lesser available amount on hand with the trustee, with the balance to be payable directly from Debtors.

Respectfully submitted,

/s/ Laura M. Nesbitt

Laura M. Nesbitt (0082629)
Counsel for Debtor
Tax Workout Group, PA
175 South 3rd Street, Suite 200
Columbus, OH 43215
(614) 800-0262 – phone
(614) 808-1627– fax
bk@taxworkoutgroup.com

NOTICE

Attorney Laura M. Nesbitt has filed papers with the court for approval of an application for compensation.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the court to grant the request sought in the application, then on or before **twenty-one (21) days from the date set forth in the certificate of service for the application**, you just file with the court a response explaining your position by mailing your response by regular U.S. Mail to Clerk of Courts, US Bankruptcy Court Southern District of Ohio, 170 North High Street, Columbus, Ohio 43215 OR your attorney must file a response using the court's ECF System.

The court must **receive** your response on or before the above date.

You must also send a copy of your response either by 1) the courts ECF System or by 2) regular U.S. Mail to Laura M. Nesbitt, 175 South 3rd Street, Suite 200, Columbus, OH 43215, and to all other parties listed on the Certificate of Service included with this motion.

If you or your attorney do not take these steps, the court may decide that you do not oppose the request sought in the application and may enter an order granting that request without further hearing or notice.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application for Compensation was served (i) electronically on the date of filing through the court's ECF System on all ECF participants registered in this case at the email address registered with the court and (ii) by ordinary U.S. Mail on February 27, 2025 addressed to:

See attached list.

Respectfully submitted,
/s/ Laura M. Nesbitt
Laura M. Nesbitt (0082629)

Label Matrix for local noticing

0648-2

Case 2:24-bk-53688

Southern District of Ohio

Columbus

Thu Feb 27 12:01:55 EST 2025

Ally Financial

PO Box 380901

Minneapolis, MN 55438-0901

Brandon S. Lefkowitz

29777 Telegraph Road, Suite 2440

Southfield, MI 48034-7667

Comenity Bank/Ann Taylor

3095 Loyalty Circle Blvd. A

Columbus, OH 43219

FinWise Bank

c/o Opportunity Financial, LLC

130 E. Randolph Street, Suite 3300

Chicago, IL 60601-6313

Instacash/MoneyLion

ML Plus, LLC PO Box 1547

Sandy, UT 84091-1547

(p)JEFFERSON CAPITAL SYSTEMS LLC

PO BOX 7999

SAINT CLOUD MN 56302-7999

Lending Club

c/o Jefferson Capital Systems

200 14th Ave. East

Sartell, MN 56377-4500

Merrick Bank

PO Box 9201

Old Bethpage, NY 11804-9001

NetCredit

175 W. Jackson Blvd. Suite 1000

Chicago, IL 60604-2863

Ally Bank

AIS Portfolio Services, LLC

4515 N Santa Fe Ave. Dept. APS

Oklahoma City, OK 73118-7901

Aqua Finance

One Corporate Dr. Suite 300

Wausau, WI 54401-1724

CSC

801 Adlai Stevenson Dr.

Springfield, IL 62703-4261

Credit One Bank

PO Box 98872

Las Vegas, NV 89193-8872

Finwise/Opploans

130 E. Randolph St. Suite 3400

Chicago, IL 60601-6379

Internal Revenue Service

PO Box 7346

Philadelphia, PA 19101-7346

Kohl's

PO Box 3115

Milwaukee, WI 53201-3115

MERRICK BANK

Resurgent Capital Services

PO Box 10368

Greenville, SC 29603-0368

MidFirst Bank

999 NW Grand Blvd. Suite 100

Oklahoma City, OK 73118-6051

Ohio Department of Taxation

Attn: Bankruptcy Division

PO Box 530

Columbus, OH 43216-0530

Ally Bank co AIS Portfolio Services LLC

4515 N Santa Fe Ave Dept APS

Oklahoma City OK 73118-7901

Asst US Trustee (Col)

Office of the US Trustee

170 North High Street

Suite 200

Columbus, OH 43215-2417

Capital One

PO Box 30285

Salt Lake City, UT 84130-0285

FB&T/Mercury

PO Box 84064

Columbus, GA 31908-4064

First Electronic Bank

c/o Opportunity Financial, LLC

130 E. Randolph Street, Suite 3300

Chicago, IL 60601-6313

(p)JAVITCH BLOCK

1100 SUPERIOR AVENUE

19TH FLOOR

CLEVELAND OH 44114-2521

LVNV Funding, LLC

Resurgent Capital Services

PO Box 10587

Greenville, SC 29603-0587

(p)MANLEY DEAS KOCHALSKI LLC

ATTN BANKRUPTCY DEPT

1555 LAKE SHORE DRIVE

COLUMBUS OH 43204-3825

Midland Credit Management, Inc.

PO Box 2037

Warren, MI 48090-2037

Ohio Gastroenterology Group

c/o I.C. Collection PO Box 64378

Saint Paul, MN 55164-0378

(p)POSSIBLE FINANCIAL INC
PO BOX 98686
LAS VEGAS NV 89193-8686

Quantum3 Group LLC as agent for
AXIOM ACQUISITION VENTURES LLC
PO Box 788
Kirkland, WA 98083-0788

Quantum3 Group LLC as agent for
Aqua Finance Inc
PO Box 788
Kirkland, WA 98083-0788

Quantum3 Group LLC as agent for
Comenity Bank
PO Box 788
Kirkland, WA 98083-0788

Quantum3 Group LLC as agent for
Crown Asset Management LLC
PO Box 788
Kirkland, WA 98083-0788

Quantum3 Group LLC as agent for
Mercury Financial/First Bank & Trust
PO Box 788
Kirkland, WA 98083-0788

Resurgent Receivables, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

SYNCB/JCrew
PO Box 71727
Philadelphia, PA 19176-1727

SYNCB/PPC
PO Box 965005
Orlando, FL 32896-5005

(p)US DEPARTMENT OF HOUSING AND URBAN DEVELOP
477 MICHIGAN AVE #1600
DETROIT MI 48226-2564

Secretary of Housing & Urban Development
c/o US Attorney
303 Marconi Blvd. Suite 200
Columbus, OH 43215-2840

Synchrony Networks
PO Box 965036
Orlando, FL 32896-5036

(p)TD BANK USA N A
ATTN C/O WEINSTEIN & RILEY P S
1415 WESTERN AVE
SUITE #700
SEATTLE WA 98101-2051

TD Bank/Target
PO Box 1470
Minneapolis, MN 55440-1470

Toyota Lease Trust
c/o Toyota Motor Credit Corporation
PO Box 9013
Addison, Texas 75001-9013

Toyota Motor Credit
PO Box 661009
Dallas, TX 75266-1009

Toyota Motor Credit Corporation
PO Box 9014
Addison, TX 75001-9014

US Attorney General
US Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0009

Verizon
by American InfoSource as agent
4515 N Santa Fe Ave
Oklahoma City OK 73118-7901

(p)VON MAUR INC
6565 BRADY STREET
DAVENPORT IA 52806-2054

Wells Fargo Bank
PO Box 393
Minneapolis, MN 55480-0393

Wells Fargo Bank, N.A.
PO Box 10438, MAC F8235-02F
Des Moines, IA 50306-0438

Wells Fargo Card Services
PO Box 14517
Des Moines, IA 50306-3517

Faye D. English
Chapter 13 Trustee
10 West Broad Street
Suite 1600
Columbus, OH 43215-3416

Laura M. Nesbitt
Tax Workout Group
175 South 3rd Street
Suite 200
Columbus, OH 43215-5194

Ryan Firestone
10003 Viburnum Dr.
Plain City, OH 43064-7550

Sara Firestone
10003 Viburnum Dr.
Plain City, OH 43064-7550

Javitch Block, LLC
1100 Superior Ave. 19th Fl.
Cleveland, OH 44114

Jefferson Capital Systems LLC
Po Box 7999
Saint Cloud MN 56302-9617

Manley Deas Kochalski
Attn: Kimberly Fulkerson
PO Box 165028
Columbus, OH 43216

Possible Financial
2231 First Ave. Suite B
Seattle, WA 98121

Secretary of Housing & Urban Development
Attn: Single Family Notes Branch
451 Seventh St. SW
Washington, DC 20410

TD Bank USA, N.A.
C/O Weinstein & Riley, P.S.
1415 WESTERN AVE, SUITE 700
SEATTLE, WA 98101

(d)U.S. Department of Housing and Urban Devel
77 West Jackson Boulevard
Chicago, IL 60604

Von Maur
6565 N Brady St.
Davenport, IA 52806

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)MidFirst Bank

(u)Ohio Department of Taxation

(u)The Woodbine Homeowners Association, Inc.

(d)MidFirst Bank
999 NW Grand Boulevard
Suite 100
Oklahoma City, OK 73118-6051

End of Label Matrix	
Mailable recipients	56
Bypassed recipients	4
Total	60



Tax Workout Group

150 East Palmetto Park Road, Suite 800
Boca Raton, Florida 33432
Phone: (561) 571-2004
Fax: (866) 511-2384
www.TaxWorkoutGroup.com

Invoice To:

Ryan D. Firestone
10003 Viburnum Drive
Plain City, Ohio 43064

Payable To:

150 East Palmetto Park Road, Suite 800
Boca Raton, Florida 33432
Phone: (561) 571-2004
Fax: (866) 511-2384
www.TaxWorkoutGroup.com

INVOICE

Invoice # 3207
Date: 02/24/2025
Due Upon Receipt

Invoice Number	Total
3207	\$5,202.56
<hr/>	
Subtotal	\$5,202.56
Tax	\$0.00
Amount Due	\$4,243.56



Tax Workout Group

150 East Palmetto Park Road, Suite 800
Boca Raton, Florida 33432
Phone: (561) 571-2004
Fax: (866) 511-2384
www.TaxWorkoutGroup.com

INVOICE

Invoice # 3207
Date: 02/24/2025
Due Upon Receipt

Ryan D. Firestone
10003 Viburnum Drive
Plain City, Ohio 43064

00487-Firestone

Ch 13

Services

Type	Date	Description	Professional	Hours	Rate	Total
Service	09/05/2024	Bankruptcy: Office conference with clients to re-sign ch 13	LN	1.00	\$425.00	\$425.00
Service	09/12/2024	Bankruptcy: Pre-file review; Update file, notes to file, email to paralegal	LN	1.00	\$425.00	\$425.00
Service	09/23/2024	Bankruptcy: Prepare, redact, submit documents to ch 13 trustee	ED	0.30	\$165.00	\$49.50
Service	09/27/2024	Bankruptcy: Draft ch 13 plan for client approval	LN	0.50	\$425.00	\$212.50
Service	10/04/2024	Bankruptcy: Receive tax return from clients; redact; submit to trustee per request	ED	0.20	\$165.00	\$33.00
Service	10/15/2024	Bankruptcy: Review case status for Telephone Conference	LN	0.20	\$425.00	\$85.00
Service	10/15/2024	Bankruptcy: Telephone Conference with client - Ryan Firestone, discuss plan payment, income, expense	LN	0.50	\$425.00	\$212.50
Service	10/17/2024	Bankruptcy: Message from client with updated pay stubs and questions on income, organize and save documents; email to LN	ED	0.20	\$165.00	\$33.00
Service	10/22/2024	Bankruptcy: Review case prior to 341; review pre-rec issues and notes on income discussion; update income for	LN	0.60	\$425.00	\$255.00

client review						
Service	10/23/2024	Bankruptcy: Attend 341 Meeting of Creditors - Zoom	LN	0.60	\$425.00	\$255.00
Service	10/24/2024	Bankruptcy: Review Ally/Capital One claim; email to LN	ED	0.10	\$165.00	\$16.50
Service	10/24/2024	Bankruptcy: Review and update I/J per clients; send portal message to request review and consent to amend	LN	0.30	\$425.00	\$127.50
Service	10/25/2024	Bankruptcy: Draft amended ch 13 plan; Revise payment per DI approved by client, revised schedules. Review all claims and correct updates to claim amendments to calculate plan correctly.	LN	1.30	\$425.00	\$552.50
Service	10/25/2024	Bankruptcy: Case Filing Task 7 - Review Toyota creditor claim, LN assessment is that objection to claim is not advisable, close task	LN	0.10	\$425.00	\$42.50
Service	10/25/2024	Bankruptcy: Contact client re: court filing fee for amendment	ED	0.10	\$165.00	\$16.50
Service	10/28/2024	Bankruptcy: Review client correspondence re: amendment to be filed	ED	0.10	\$165.00	\$16.50
Service	10/28/2024	Bankruptcy: Prepare amended B, DF and amended plan for attorney review; email to Trustee with proof of wife's 1099 income	ED	0.60	\$165.00	\$99.00
Service	10/28/2024	Bankruptcy: Final preparation for amendments for filing per LN.	ED	0.30	\$165.00	\$49.50
Service	10/28/2024	Bankruptcy: Submit additional documents to trustee per request	ED	0.10	\$165.00	\$16.50
Service	10/31/2024	Bankruptcy: Review trustee objection to confirmation; email to LN	ED	0.10	\$165.00	\$16.50
Service	11/12/2024	Bankruptcy: Review all issues affecting confirmation; email to LN	ED	0.20	\$145.00	\$29.00
Service	11/20/2024	Bankruptcy: Review IRS proof of claim; send tax return signature pages to client to sign and return to provide to claim filer for amendment	ED	0.30	\$165.00	\$49.50
Service	12/04/2024	Bankruptcy: Send follow up email to client regarding request for signatures for tax returns for IRS and issues affecting confirmation	ED	0.20	\$165.00	\$33.00

Service	12/05/2024	Bankruptcy: Receive signature pages from client; updated case tasks and email IRS claim filer Tiffany Dizard.	ED	0.20	\$165.00	\$33.00
Service	12/10/2024	Bankruptcy: Review amended IRS claim; email to POC filer with request for information or additional corrections per return submitted	ED	0.20	\$165.00	\$33.00
Service	12/12/2024	Bankruptcy: Email to client: Reminder to complete financial management course	ED	0.10	\$165.00	\$16.50
Service	12/12/2024	Bankruptcy: Review docket for confirmation draft amended plan A2 (need to email client for input); Send email to case admin	LN	0.40	\$425.00	\$170.00
Service	12/12/2024	Bankruptcy: Review and draft amendments and advise to client re: issues affecting confirmation; notes and changes for updates to case	LN	0.70	\$425.00	\$297.50
Service	12/12/2024	Bankruptcy: Portal message to client to request info and preference on secured claims to be added to plan	LN	0.10	\$425.00	\$42.50
Service	12/13/2024	Bankruptcy: Initial draft objection re: Aqua Finance claim, email to attorney	ED	0.50	\$165.00	\$82.50
Service	12/13/2024	Bankruptcy: Review draft of objection to proof of claim; review liens and check calculation; research on liens; update objection to claim for filing	LN	1.10	\$425.00	\$467.50
Service	12/23/2024	Bankruptcy: Correspond with Midland Mortgage	ED	0.20	\$165.00	\$33.00
Service	01/03/2025	Bankruptcy: Review pre-confirmation issues; email trustee	LN	0.30	\$425.00	\$127.50
Service	01/03/2025	Bankruptcy: Review IRS Proof of Claim; Email to IRS requesting they file amended proof of claim in regards to 2022 tax liability	AH	0.20	\$145.00	\$29.00
Service	01/10/2025	Bankruptcy: Message to client requesting proof of expenses in effort to resolve Trustee's Objection	AH	0.20	\$145.00	\$29.00
Service	01/16/2025	Bankruptcy: Email to IRS attaching 2022 return- request for amended proof of claim	AH	0.10	\$145.00	\$14.50
Service	01/16/2025	Bankruptcy: Email from trustee re: plan status; respond	LN	0.10	\$425.00	\$42.50
Service	01/16/2025	Bankruptcy: Portal message to client	LN	0.10	\$425.00	\$42.50

re: delinquent plan payments; 14-days to be current.						
Service	01/23/2025	Bankruptcy: draft and upload order granting obj. POC	ED	0.30	\$165.00	\$49.50
Service	01/23/2025	Bankruptcy: Draft Objection to IRS proof of claim- email to attorney Nesbitt for review	AH	0.40	\$145.00	\$58.00
Service	01/31/2025	Bankruptcy: Call to clients detailing plan delinquency and explaining possible dismissal if proof of payment is not provided	AH	0.20	\$145.00	\$29.00
Service	02/03/2025	Bankruptcy: Email from client re: plan payment issues; prepare response.	LN	0.20	\$425.00	\$85.00
Service	02/06/2025	Bankruptcy: Review letter from Midland confirming occupancy; faxed back Subject: SRFax Transmission Successful to 1 405-767-5815	ED	0.30	\$165.00	\$49.50
Service	02/13/2025	Bankruptcy: Contact client; Scheduled telephone conference with attorney Nesbitt regarding dismissal of Chapter 13	AH	0.10	\$145.00	\$14.50
Service	02/18/2025	Bankruptcy: Scheduled telephone conference with attorney Nesbitt to discuss impending dismissal and options	AH	0.10	\$145.00	\$14.50
Service	02/19/2025	Bankruptcy: Review dismissal; email paralegals to review time entries for fee application	LN	0.10	\$425.00	\$42.50
Service	02/21/2025	Review time entries and update for fee application	LN	0.60	\$425.00	\$255.00
Non-billable services						
Service	12/16/2024	Bankruptcy: File objection to proof of claim; email attorney; updated tasks	ED	0.30	\$165.00	\$49.50
Service	12/17/2024	Bankruptcy: Prepare service for objection to proof of claim	ED	0.20	\$165.00	\$33.00
Service	02/14/2025	Bankruptcy: Call to client to discuss case status - leave voicemail	LN	0.10	\$425.00	\$42.50
Quantity Subtotal						16.3
Services Subtotal						\$5,108.50

Expenses

Type	Date	Description	Quantity	Rate	Total
Expense	10/25/2024	Filing Fee: Amendment to Schedules.	1.00	\$34.00	\$34.00
Expense	10/28/2024	Document Mailing - 24-10-28.D14 - 1ST AM PLAN, Order# 2023044	1.00	\$7.90	\$7.90
Expense	10/28/2024	Document Mailing - 24-10-28.D14 - 1ST AM PLAN, Order# 2023049	1.00	\$43.50	\$43.50
Expense	12/17/2024	Document Mailing - 24-12-16.D24 - OBJ. POC 13, Order# 2068429	1.00	\$7.41	\$7.41
Expense	12/17/2024	Document Mailing - 24-12-16.D24 - OBJ. POC 13, Order# 2068435	1.00	\$1.25	\$1.25
Expenses Subtotal					\$94.06
Quantity Total					16.3
Subtotal					\$5,202.56
Total					\$5,202.56
Payment (09/11/2024)					-\$415.00
Payment (02/26/2025)					-\$544.00
Balance Owing					\$4,243.56

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
3207	02/24/2025	\$5,202.56	\$959.00	\$4,243.56
Outstanding Balance				\$4,243.56
Total Amount Outstanding				\$4,243.56

IOLTA Account - Chase

Date	Type	Description	Matter	Receipts	Payments	Balance
09/13/2024		Online payment deposit	00487-Firestone		\$510.00	\$510.00
10/25/2024		Online payment deposit	00487-Firestone		\$34.00	\$544.00

02/26/2025	Payment for invoice #3207	00487-Firestone	\$544.00	\$0.00
IOLTA Account - Chase Balance			\$0.00	

Please make all amounts payable to: Tax Workout Group, P.A.

150 East Palmetto Park Road, Suite 800
Boca Raton, Florida 33432
Phone: (561) 571-2004
Fax: (866) 511-2384
www.TaxWorkoutGroup.com

INVOICE

Invoice # 3207
Date: 02/24/2025
Due Upon Receipt



Pay your invoice online

To pay your invoice, open the camera on your mobile device and place the QR code in the camera's view.

Or, [click here](#) if you're viewing on a computer or smartphone.